



**Office of the New York State  
Attorney General**

**Letitia James  
Attorney General**

March 24, 2025

**By ECF**

Honorable Gary Stein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Jaime v. Bilka*, No. 24 Civ. 266 (DEH) (GS)

Dear Magistrate Judge Stein:

The Office of the Attorney General (“OAG”) writes to provide updated information in response to the Court’s orders, issued on March 18 and June 5, 2024 pursuant to *Valentin v. Dinkins*, 121 F.3d 72, 76 (2d Cir. 1997). (See ECF Nos. 7, 14.) Those orders directed the OAG to assist in identifying the New York State court officers who were referenced as “John Doe” defendants in the Amended Complaint filed by Plaintiff *pro se* Luis Jaime. (ECF No. 10.)

By letters dated July 17 and July 19, 2024, we identified the John Doe defendants and their place of business, i.e., the New York County Criminal Court, 100 Centre Street, New York, New York 10013. (ECF Nos. 15, 17.) On August 6, 2024, Plaintiff filed a second amended complaint (the “SAC”) naming the court officer defendants. (ECF No. 19.) A process server delivered copies of the SAC, directed to each defendant at the criminal courthouse, on March 7, 2025. See Marshal’s Process Receipts and Returns of Service, Mar. 14, 2025 (ECF Nos. 24-31).

After being served, seven of the eight defendants requested representation by the OAG in this action, and I entered my appearance on their behalf.<sup>1</sup> (ECF No. 32.) However, counsel for the New York State Office of Court Administration (“OCA”) advised the OAG that one named defendant, Senior Court Officer Pasquale Cugliandro, retired several months ago. As such, the attempt to serve him at the criminal courthouse was ineffective. On March 21, 2025, I spoke by telephone with Mr. Cugliandro, who confirmed his retirement and stated that his current address for service is 70 Coachlight Square, Montrose, New York 10548. Pursuant to New York Public Officers Law § 17, the OAG cannot appear on behalf of a defendant unless and until the individual is served, requests representation, and we have duly evaluated the request.

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<sup>1</sup> The OAG represents New York State Court Officers Steven Bilka, Matthew Maldonado, Christopher Chester, Tyron Patterson, Christopher Roca, Lieutenant Michael Desharnais, and Major Michael McKee.

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We trust that this information will be helpful to the Court and to Plaintiff.

Respectfully submitted,  
*Michael A. Berg*  
Assistant Attorney General

cc: Mr. Luis Jaime (by U.S. Mail)